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Inventor Application of:  
Sunny K. Yee

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For: Method and Apparatus for  
Supporting Preprocessing in a Web  
Presentation Architecture

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December 11, 2007  
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Seanelle Dice

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Dear Sir:

Appellant respectfully submits this Pre-Appeal Brief Request for Review concurrently with a Notice of Appeal. In view of the clear legal and factual errors set forth below and in view of the discussion on pages 6-9 of the previous response, Appellant respectfully requests the Panel to withdraw all outstanding rejections. In the Office Action, the Examiner rejected claims 1-23 under 35 U.S.C. § 103(a) being unpatentable over Hanzek (U.S. Patent No. 6,980,963, hereinafter "Hanzek") in view of Klevenz et al. (U.S. Publication No. 20030137540, hereinafter "Klevenz"). Appellant respectfully traverses this rejection. This rejection is clearly improper and must be withdrawn.

***The cited references are missing features recited by independent claim 1.***

Independent claim 1 recites, *inter alia*, "a controller that is adapted to receive a request for data *from a user*...and a preprocessor that is adapted to search for a preprocessor action associated with a portal registered to the request, wherein *the controller* invokes the preprocessor *before* processing the request for data" (emphasis added).

First, the Examiner relies on Hanzek for the disclosure of "a controller that is adapted to receive a request for data *from a user*." Specifically, the Examiner relies on FIG. 3 of Hanzek, in combination with a passage from column 8, line 58 through column 9, line 14 of Hanzek. However, the Examiner does not mention which component of the Hanzek system relates to the

controller. Based on the Office Action mailed March 8, 2007, the Examiner presumably equates the order processor 352 to the controller. However, the order processor 352 of Hanzek reference does not include a controller that receives a request from a user. For instance, FIG. 3 of Hanzek depicts a sales processor 332 that is in communication with a portal 318, and acts as an intermediary to the order processor 352. Vehicle order information submitted by a consumer is relayed from a portal 318 to the sales processor 332, and the sales processor 332 communicates associated order data to the order processor 352. *See* Hanzek, col. 8, ll. 46-48, 58-67. Accordingly, the Hanzek reference does not disclose a controller that receives a request from a user, as recited by the present independent claim 1, but instead receives request from another processor (e.g., the sales processor 332).

Second, the Examiner acknowledges, that Hanzek does not disclose “a preprocessor that is adapted to search for a preprocessor action associated with a portal registered to the request, wherein the controller invokes the preprocessor before processing the request for data,” as stated by the Examiner on page 4 of the current Final Office Action, mailed September 11, 2007. Instead, the Examiner relies on Klevenz in an attempt to obviate this deficiency of Hanzek. However, Appellant contends that the references do not disclose a preprocessor in accordance with the present independent claim 1. For example, the references do not disclose “*the controller invokes the preprocessor before processing the request for data*” (emphasis added), as recited in independent claim 1. In the Final Office Action, the Examiner equated the page processor 740 of Klevenz to the preprocessor and the dynamic page controller 760 of Klevenz to the controller. However, as depicted in FIG. 7 and disclosed in paragraphs [0102]-[0105] of Klevenz, the page processor 740 is invoked prior to and independent of the dynamic page controller 760. For example, when a user selects a button, a request is passed to a page portal component 730, and the page processor 740 handles the request. *See* Klevenz [0104]. The dynamic page controller 760 does not invoke the page processor 740 processing the request for data.

Third, Klevenz does not appear to disclose a “preprocessor that is adapted to *search for a preprocessor action associated with a portal*,” as recited by independent claim 1. In fact, the Examiner does not address this limitation in any detail. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current independent claim 1 and its dependent claims.

***The cited references are missing features recited by independent claim 9.***

Independent claim 9 recites, *inter alia*, “creating, with a processor-based device, a *model-view-controller architecture* comprising a controller that receives requests for data *from users* and responds to the requests by obtaining requested data; and providing a preprocessor manager that executes a desired action to produce information *accessible by the controller for a desired time of incoming user requests*” (emphasis added).

First, similar to the previous discussion with regard to independent claim 1, neither Hanzek nor Klevenz teaches or suggests a controller that receives a request from user. Second, the references do not disclose a model-view-controller architecture. In the Examiner’s rejection of dependent claim 8 which includes similar limitations and recites, *inter alia*, “a model and a view separate from one another,” the Examiner pointed to a section of the Hanzek reference (Hanzek, col. 14, lines 12-30) that generally includes a system and method to “tag” a selected vehicle after viewing the vehicle to secure the purchase. However, the cited portion of the Hanzek reference (col. 14, lines 12-30) merely contemplates “hiding” data in the data import database 614 and does not address the “view” presented to a user. In other words, when a user selects a vehicle, the data is updated to reflect that the vehicle has been “tagged” by a purchaser. This merely modifies data in the database such that the unit is no longer available to other users, but does not address the “view” presented to the user based on the data. Further, the Klevenz reference does not teach or suggest a model-view-controller architecture as recited by the present independent claim 9.

Third, the references do not disclose a “preprocessor manager that executes a desired action to produce information *accessible by the controller for a desired time of incoming user requests*” (emphasis added). Appellant notes that the Examiner has relied on several passage of Hanzek as disclosing the preprocessor manager and its limitations. However, Hanzek relates to a system of accepting a user request and retrieving the “real-time” information prior to the placement of the order (Hanzek col. 2 lines 53-60). This includes relaying information between various processors, but does not teach or suggest a preprocessor that produces information accessible by the controller for a desired time of incoming user requests, in accordance with present independent claim 9. Further, Klevenz does not obviate this deficiency. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current independent claim 9 and its dependent claims.

***The cited references are missing features recited by independent claim 14.***

Independent claim 14 recites, *inter alia*, “means for creating a...controller being adapted to receive a request for data *from a user*...and means for *preprocessing an action* to produce session-scoped information accessible by the controller, wherein preprocessing the action is performed *prior* to the controller processing the request to obtain the requested data” (emphasis added).” Similar to the arguments presented above with regard to independent claim 1, Hanzek and Klevenz fail to teach or suggest each limitation recited by independent claim 14. For example, neither of the references teaches or suggests a controller adapted to receive a request for data from a user, nor do they teach or suggest preprocessing performed prior to the controller processing the request to obtain the requested data. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current independent claim 14 and its dependent claims.

***The cited references are missing features recited by independent claim 18.***

Independent claim 18 recites, *inter alia*, “a controller logic... adapted to receive and process a *user request* for data; and a preprocessor manager...adapted to receive a request from the controller logic to invoke an action class *prior* to the controller logic processing the user request” (emphasis added). Similar to the arguments presented above with regard to independent claim 1, Hanzek and Klevenz fail to teach or suggest each limitation recited by independent claim 18. For example, neither of the references teaches or suggests a preprocessor manager adapted to receive a request from the controller logic to invoke an action class prior to the controller logic processing the user request. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current independent claim 18 and its dependent claims.

***The cited references are missing features recited by dependent claims 6, 16, and 20.***

Dependent claims 6, 16 and 20 generally recite limitations relating to an action by the preprocessor including “admission control.” For example, dependent claim 6 recites, *inter alia*, “the preprocessor action comprises an admission control adapted to continue interaction with a desired server for the duration of the user session,” dependent claim 16 recites, *inter alia*, “the means for preprocessing comprises means for controlling admission to a portal,” and dependent claim 20 recites, *inter alia*, “the action class comprises a bridge, an admission control, a locale, or a combination thereof.” As recited in the claims and disclosed in the specification, the admission control action may ensure that the user remains at a particular server for the duration of a session. In this manner, the admission control action ensures that all information stored on the server is

available for the duration of the session. Specification, [0037]. However, Hanzek and Klevenz do not teach or suggest such a limitation. The references generally relate to the transmittal of information between processors and servers, but make no mention of admission control, e.g., ensuring that a user remains at a particular server for the duration of a session. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current claims 6, 16 and 20.

***The cited references are missing features recited by dependent claim 23.***

Dependent claim 23 depending from claim 1 and recites *inter alia*, “the preprocessor processes an action associated with the portal, the preprocessor *redirects to a uniform resource identifier* and the *controller ignores the original request*.” (emphasis added). In addition to the limitations of independent claim 1 discussed above, Hanzek and Klevenz fail to teach or suggest a preprocessor that redirects to a uniform resource identifier. The Examiner suggest that these limitations may be found in FIG. 7 and paragraph [0102] – [0105] Klevenz. However, as discussed in these and other passages of Klevenz, the disclosed system is directed to dynamically generating a page for each request, and does not include an action that redirects to another page or uniform resource identifier. *See* Klevenz, [0104]. In view of these deficiencies among others, the cited references, taken alone or in hypothetical combination, cannot render obvious the current claim 23.

***The cited references are missing features recited by dependent claim 8.***

For reasons similar to those discussed above with regard to independent claim 9, the cited references, taken alone or in hypothetical combination, cannot render obvious the current claim 8.

**Conclusion**

For these reasons, among others, Appellant respectfully requests withdrawal of the foregoing rejections under Section 103. Appellant respectfully submits that all pending claims are in condition for allowance.

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Respectfully submitted,



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